Chicopee Police Department

110 Church St., Chicopee, Ma. 01020

7/11/2025

Dear Jon Gerhardson

Your public records request for *records relating to the configuration, settings, metadata, and data from all network cameras manufactured by Axis Communications ("Axis Cameras") in the department's possession, as well as any associated analytical applications,* was received by the Chicopee Police Department on 7/1/2025.

1. **Device Inventory**

A complete inventory of all Axis Cameras in use. For each camera, please provide:

- The Model Number
- The installed Axis OS version
- The assigned hostname or device label
- The general device location

2. **Camera Configuration Files**

The complete configuration file for each camera, otherwise referred to as the "Plain Config" file.

3. **General Camera Configuration Setting**

Records for each camera reflecting the current settings for the following common parameters, where applicable to the model:

- Video stream and image settings: All configured stream profiles, including resolution, frame rate, compression, and zipstream strength.
- Image enhancement: Wide dynamic range (WDR) settings and day-night thresholds.
- Privacy and overlays: All configured privacy masks and text/image overlays.
- Event rules: A list of all configured rules, including the conditions that trigger an action and the corresponding actions.
- Storage and audio: The configured retention time for all storage and records indicating if "include audio" is enabled.

4. **Installed applications and Associated Data**

    A. A list of all installed Axis camera application platform (ACAP) applications on each camera.

    B. Records for each camera running the Axis license plate verifier application:
    - Application configuration file: The application-specific configuration backup file, generated as a JSON file via the "backup configuration" function.
    - License plate lists: A complete export in .csv format, of all license plates contained in the "allow list" and "block list" including the license plate number and any associated description or schedule information.
    - Event log: A complete export of the "event log" from the last 90 days in .csv format.
    - Applications settings: Records reflecting the chosen operational mode ("free flow" or "access control"), event storage rules, detection parameters (sensitivity, allowed character deviation, strict matching), and any configured integration settings for pushing event data to external servers.

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In regards to request part **1. Device Inventory:**

The Chicopee Police Department has provided you with records denoting the model numbers and general device location of all Axis cameras in use by the department.

Unfortunately, the Chicopee Police Department is unable to provide you with records of the assigned "hostname" or device label for all Axis cameras as the cameras do not have assigned hostnames or device labels and therefore the department does not have possession, custody, or control of any such record and is not required by law to create one upon request. For further explanation see bolded excerpt describing the mandatory disclosure provision blow.

The mandatory disclosure provision of the Public Records Law only applies to information that is in the custody of the Department at the time the request is received. As a result, there is no obligation for a Department to create a record for a requester to honor a request. See G.L. c. 4, section 7(26) (defining "public records" as materials which have already been "made or received" by a public entity); see also 32 Op. Att'y Gen. 157, 165 (May 18, 1977) (custodian is not obliged to create a record in response to a request for information); see also A Guide to the Massachusetts Public Records Law, Secretary of the Commonwealth, Division of Public Records, p. 8 (March 2020).

Lastly, the department intends to withhold the records pertaining to the version of the Axis OS (operating system) installed on the cameras due to the applicability of the following exemption and the reasons set forth below:

Exemption N – Facility Security

"Records, including, but not limited to, blueprints, plans, policies, procedures and schematic drawings, which relate to internal layout and structural elements, security measures, emergency preparedness, threat or vulnerability assessments, or any other records relating to the security or safety of persons or buildings, structures, facilities, utilities, transportation, cyber security, or other infrastructure located within the commonwealth, the disclosure of which, in the reasonable judgment of the record custodian, subject to review by the supervisor of public records under subsection (b) of section 10 of chapter 66, is likely to jeopardize public safety or cyber security. "

The Chicopee Police Department intends to withhold the OS (operating system) version installed on the cameras because it is the department's belief that public disclosure of such information would constitute a breach of facility security. Operating systems are complex networks that manage all hardware and software of a device including memory, processes, and user applications. The OS relies on a device's firmware to interact with the hardware as well as perform basic tasks. Knowledge of the OS version utilized by department operated cameras would provide insights into the architecture of the device's software and the components that make up the camera system as well as reveal the structure of the firmware enabling anyone to access and exploit the vulnerabilities that exist within it.

In regards to request part **2. Camera Configuration Files:**

The Chicopee Police Department does not have possession, custody, or control of any such record and so is unable to process your request. In the Axis camera system, the "configuration file" is a selection of settings that are viewed and manipulated through a drop-down style menu. These settings are not able to be extracted and viewed in any other format and manually creating a record with all the relevant data would constitute creating a record, which the department is not required by law to do. For further explanation please refer to the bolded excerpt describing the mandatory disclosure provision above.

In regards to request part **3. General Camera Configuration Setting:**

The Chicopee Police Department does not have possession, custody, or control of any such record and so is unable to process your request. The general camera configuration settings are only displayed in the settings tab of each specific camera and are not available in a consolidated and exportable document. In order to provide such a record every single setting of every single camera in operation would need to be manually and individually compiled, constituting the creation of a record, which the department is not required by law to do. For further explanation see the bolded excerpt describing the mandatory disclosure provision above.

In regards to request part **4. Installed applications and Associated Data**, **Section A (A list of all installed Axis camera application platform (ACAP) applications on each camera):**

The Chicopee Police Department does not have possession, custody, or control of any such record and so is unable to process your request. All applications on the Axis camera application platform were installed by default and are not being utilized by the department in any capacity at this time. The default applications installed on each camera are only viewable by selecting the "applications" tab on each individual camera and are not available in an exportable document. In order to provide a list of all applications they would need to be manually compiled constituting the creation of a record, which the department is not required by law to do. For further explanation see the bolded excerpt describing the mandatory disclosure provision above.

In regards to request part **4. Installed applications and Associated Data**, **Section B (Records for each camera running the Axis license plate verifier application):**

The Chicopee Police Department is unable to process your request. At this time, no cameras are running the Axis license plate verifier application, therefor the department does not have possession, custody, or control of any such record and is not required by law to create one upon request. For further explanation see bolded excerpt describing the mandatory disclosure provision above.

You have the right to appeal this decision to the Supervisor of Records, at the address below. The Appeal should include your original request along with this response to:

Supervisor of Records Office of the Secretary of the Commonwealth McCormack Building, Room 1719 One Ashburton Place Boston, MA 02108.

You also have the right to seek judicial review of an unfavorable decision by commencing a civil action in the superior court.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully,

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Records Access Officer
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